

# **Baldy Mountain Vegetation Management Project**

## **Scoping Summary**

Mar. 18, 2019

This document addresses the public comments received during a scoping period which occurred from mid-December 2018 through January 2019, for the Baldy Mountain Vegetation Management project. Scoping input was received as a result of the project appearing on the web page, and letters and e-mails sent to adjacent landowners and those who had previously expressed interest in the project. The Forest Service presented a preliminary proposed action during this timeframe.

The Forest Service typically separates scoping comments into two groups: *Issues* and *Non-Issues*. *Issues* are defined as concerns or suggestions that could directly or indirectly result from implementing the proposed action. An issue also results in the generation of an alternative, part of an alternative, design criteria, or mitigation measure which specifically addresses that issue. The purpose of identifying issues at this stage of the analysis is to define the scope of the analysis and ensure that important concerns or opportunities are not overlooked.

Classification of a comment as a *non-issue* does not mean it is not important, it only means that it does not meet the above definition and will not be addressed in this analysis. *Non-Issues* fall within several general categories, with examples given:

- 1) Outside the scope of the proposed action or irrelevant to the decision to be made;
  - Requests for information
  - Requests to be added to the mailing list.
  - Matters not under the authority of the Forest Service.
- 2) Already decided by law, regulation, Forest Plan, or other higher level decision;
  - NEPA processes, NFMA requirements, and Executive Orders are already defined in Forest Service policy and guidance and will be followed.
  - Suggestions for what should be included in the EA analysis (e.g.- analysis of vegetation impacts, analysis of impacts to sensitive species, etc) are standard procedures and will be included.
  - Travel Management decisions have previously been made and will not be changed under this project decision. E.g. – Baldy Mountain Loop Trail seasonal closure dates.
- 3) Opinion, conjectural, and not supported by scientific or factual evidence; or
  - A “vote” for an alternative with no supporting rationale does not provide us with issues to be addressed or ideas for alternatives. The decision resulting from a NEPA analysis is not based on a popular vote.
  - There is no evidence that fire risk or fire suppression costs are drastically reduced in the spruce-fir type due to timber harvest because fires in this vegetation type are driven by climate and weather rather than fuels. This is not a fuels reduction project.
- 4) Purely supportive of, included in, or addressed by the Purpose and Proposed Action.
  - Statements of support for the proposal that do not result in the need to create an alternative.
  - Statements that make suggestions for what is already included in the Purpose and Proposed Action, eg:
    - To increase understory forage for grazing.
    - To provide forest products for industry

The scoping period generated written responses from 5 sources. There were recurring Issues mentioned throughout many of the comments. These Issues were grouped together by theme, and are listed in Table 1

below. A listing of all the commentors then follows in Table 2, showing which Issues and/or Non-Issues each commentor mentioned. Full text of the comments can be found in the project record.

An Environmental Assessment will be prepared. The Issues will be responded to and analyzed in either an alternative or design criteria/mitigation measures in the EA. A 30-day public comment period will be held for public review of the pre-decisional draft EA.

The following Issues were identified by the Forest Service:

**Table 1. Summary of Issues**

<b><u>Issue Theme</u></b>	<b><u>Specific Issues</u></b>	<b><u>Commentor #</u></b>	<b><u>Where addressed in EA</u></b>
1. Forest Health	Project increases and public safety	4	Recr Section
	Soils, erosion, and riparian areas should be addressed, including how temp roads are rehabilitated	Internal	Proposed Action, Design Criteria
2. Economics	Include as many acres as possible to make the project economically feasible and flexible	2, 5	Proposed Action
	Volume/acre must be high enough to be economically feasible	2, 5	Proposed Action, Design Criteria
	Minimize temp roads and road maintenance to lower operational costs	2, 5	Proposed Action, Design Criteria
	Design Criteria should be tied to Forest Plan and costs of implementing them should be analyzed	2, 5	Econ Section
	Use R2 Optional Utilization Standards to minimize the requirement to take small diameter unusable material	2, 5	Proposed Action, Design Criteria
	Build flexibility into the design due to changing market needs and different operators' needs	2, 5	Proposed Action, Design Criteria
	Minimize surface rock and slash deposits to make the project economically feasible due to haul distances	2	Proposed Action, Design Criteria
	Allow operations to continue through the winter	2, 5	Proposed Action, Design Criteria
3. Wildlife	Increase forage for wildlife	4	Veg Section, Wildlife Section
	Avoid activities during calving/fawning season May15-June30	6	Design Criteria, Wildlife Section
	Maintain visual screening for hiding cover along Baldy Loop Trail and BM Road	6	Design Criteria, Wildlife Section
	Provide a mosaic of cut plots 20-100 acres in size	6	Proposed Action, Design Criteria
	Maintain or reduce road density for better habitat, close and rehab all temp and ML1 roads	6	Design Criteria, Wildlife Section
	Provide off-site mitigation for fish and watershed	Internal	Proposed Action, Watershed Section, Fish Section
4. Weeds	Active weed management should be done post-treatment	6	Design Criteria, Veg Section
	Equipment should be cleaned beforehand	6	Design Criteria, Veg Section
5. Recreation	Projects will make recreation more desirable if forest is healthy	4	Recr Section
	Avoid Operations during main hunting seasons Oct10-Nov20	6	Alt.s Dismissed, Design Criteria

**Table 2. Individual Scoping Commentors**

<b>Comment #</b>	<b>Commenter (alphabetical)</b>	<b>Affiliation</b>	<b>Dated or Received</b>	<b>Issue #</b> 1. Forest Health 2. Economics 3. Wildlife 4. Weeds 5. Recreation	<b>Non-Issue #</b> 1. Outside scope or irrelevant 2. Already decided 3. Opinion or conjectural 4. Supportive or included in Proposal
1.	Artley, Dick		2/8/19		1- request to be on mailing list
2.	Birtcher, Normand	Montrose Forest Products	01/28/19	2	4- supportive
3.	Gandolf, Richard and Judith		12/30/18	2	3- firefighting cost reduction not supported 4- supportive
4.	Paulek, Mindy			1, 3, 5	3- fire risk reduction not supported 4- supportive, included in Purpose
5.	Pitts, Molly	Intermountain Forest Assoc.	1/28/19	2	4- supportive
6.	Smith, Ty	Colorado Parks and Wildlife	1/22/19	3, 4, 5	2- Travel Mgt. decisions previously made